



## **THERMO FISHER SCIENTIFIC INC: MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2019**

Thermo Fisher Scientific is fully committed to acting ethically and with integrity, combatting slavery and human trafficking across our global operations.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 (the "Act") and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2019. It is intended to provide our customers, stakeholders and investors with information on the systems and controls that we implement to ensure slavery and human trafficking is not taking place in our supply chain.

Our previous Modern Slavery and Human Trafficking statements are available [here](#).

### **Organization Structure**

Thermo Fisher Scientific Inc., as parent company of the Thermo Fisher Scientific group of companies ("Thermo Fisher Scientific" or the "Group"), issues this statement on behalf of itself and each of its subsidiaries that are subject to the Act and in particular its UK subsidiaries listed in the Appendix.

Thermo Fisher Scientific is the world leader in serving science, with approximately 75,000 employees, operations in over 100 countries worldwide and revenues of more than \$25 billion. Our stock is traded on the New York Stock Exchange under the symbol "TMO".

Our mission is to enable our customers to make the world healthier, cleaner and safer. We help our customers accelerate life sciences research, solve complex analytical challenges, improve patient diagnostics and therapies and increase productivity in their laboratories.

Through our industry-leading brands – Thermo Scientific, Applied Biosystems, Invitrogen, Fisher Scientific, Unity Lab Services and Patheon – we offer a unique combination of innovative technologies, purchasing convenience and pharmaceutical services.

For more information, please visit [here](#).

### **Our Policies**

Thermo Fisher Scientific is committed to ensuring that we conduct our global business with respect for human rights and in compliance with applicable laws and fair labor practices, as evidenced by the following policies:

- [Supplier Code of Conduct](#)
- [Global Equal Employment Opportunity and Human Rights Policy](#)
- [Conflict Minerals Statement](#)
- [Code of Business Conduct and Ethics](#)

### **Our Internal Policies on Slavery and Human Trafficking**

Thermo Fisher Scientific is committed to ensuring that our suppliers are aware of their obligations and our position in relation to modern slavery or human trafficking across our global business and operations. Our Code of Business Conduct and Ethics (the "Code") reflects our commitment to acting ethically and with integrity in all our business relationships. All employees receive compulsory annual training on the importance of acting ethically and with integrity in every area of our business. Any

employee who observes or suspects a violation by the Company of any law, regulation, or the Code, is expected to contact a member of the Company's Legal Department or to use Thermo Fisher Scientific's Ethics Hotline.

The Ethics Hotline is available to all employees to raise all forms of concern they may have, anonymously if requested, including those relating to human rights issues. Reports to Thermo Fisher Scientific's Ethics Hotline of violations of law, the Code, or other Thermo Fisher Scientific policies are rigorously investigated.

## **Our Supply Chain**

Through our supply chain, we source components that are used both at Thermo Fisher Scientific facilities and by our external partners to manufacture our products. We purchase goods and services from thousands of suppliers around the globe. As a result, our supply chain is global and complex.

Thermo Fisher Scientific is committed to implementing effective systems and controls to ensure that our suppliers recognise our position in relation to compliance with all applicable laws and regulations, including those relating to the prohibition of slavery and human trafficking.

Thermo Fisher Scientific has four key corporate values - Integrity, Intensity, Innovation, and Involvement. These four values form the foundation of our business, and Thermo Fisher Scientific expects that our suppliers hold these same values.

More information about our supply chain can be found [here](#).

## **Supplier Code of Conduct**

Our Supplier Code of Conduct outlines expectations that we have for all of our suppliers. These are in line with our corporate values and include:

- prohibitions on use of child labor, as described in Minimum Age Convention 138 and Worst Forms of Child Labor Convention 182 of the International Labor Organization;
- prohibitions on forced labor/prison labor, as described in Article 2 in the Forced Labor Convention 29 and Article 1 in the Abolition of Forced Labor Convention 105 of the International Labor Organization;
- compliance with all applicable labor laws, rules, and regulations, including but not limited to, all laws forbidding the solicitation, facilitation, or any other use of slavery, servitude, forced or compulsory labor or human trafficking;
- requirements for our suppliers to provide to us all information or material required to enable Thermo Fisher Scientific to ensure compliance with such laws, rules, and regulations; and
- commitments to responsible sourcing practices (including taking appropriate health and safety measures, acting in an environmentally responsible manner and commitments to diversity and inclusion).

## **Supply Chain Due Diligence**

We have a zero tolerance policy to slavery and human trafficking within our supply chain. We have robust supply chain due diligence and audit processes in place as part of our corporate commitment to supply chain compliance, and in particular, responsible sourcing of materials used in our products. Further details are available for review [here](#).

We continue to conduct detailed risk assessments, working with our Global Sourcing function and a third party partner, Assent Compliance Inc. ("Assent"), to identify the suppliers that we believe are exposed to the highest risk of modern slavery and human trafficking.

In 2019, we retained focus on reviewing suppliers in India, China, Bangladesh and Pakistan, countries which, according to the Global Slavery Index<sup>1</sup>, are home to more than half of the global population of people held in some form of slavery. We expanded our efforts to contact and generate responses from non-responsive suppliers and from those who submitted incomplete responses.

We also expanded our diligence processes for suppliers to our Fisher Scientific business, a sales channel for a large number of third party manufacturers as well as our internally manufactured products. Fisher Scientific worked with Assent to conduct diligence on a risk-assessed list of suppliers (based on volume, category of products supplied and location of supplier and their manufacturing locations). By way of example, a key focus of this effort was to ensure robust ethical sourcing practice in respect of medical gloves, an area where concerns regarding labor rights in Asian countries (including Malaysia and Thailand) have been well documented.

## **Training**

Compliance training is regularly undertaken by all employees. All directors, officers and employees of Thermo Fisher Scientific are also responsible for reviewing the Code and confirming annually that they will comply. In addition, all employees are given annual training on specific Code elements to ensure they have a complete understanding of what is expected of them.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide additional training to our procurement staff. We also require our business partners to provide training to their own staff, suppliers and providers.

In 2019, through Assent, we delivered enhanced compliance training to selected internal procurement teams in higher risk regions. We are also now working with Assent to expand this program in 2020 to additional regions and to incorporate direct enhanced training for our suppliers in these regions.

## **Our effectiveness in combatting Slavery and Human Trafficking**

In order to maintain and continually improve supplier and subcontractor performance we:

- share best practices and work with our key suppliers and subcontractors to eliminate or reduce supply chain risks;
- have implemented a set of guidelines for suppliers and subcontractors, which address social and environmental issues such as child labor, slavery and human trafficking, freedom of association and hazardous substances; and
- monitor and work to improve supplier diligence response rates via targeted initiatives.

Our actions as described above support the Thermo Fisher Scientific long-term commitment to respect the human rights of all people and to improve the quality of life in the communities we serve.

**Signed on behalf of Thermo Fisher Scientific Inc.**



**Michael Boxer**

**Senior Vice President and General Counsel**

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<sup>1</sup> <https://www.globallslaveryindex.org/>

## Appendix

### Thermo Fisher Scientific Inc. significant UK subsidiaries

FEI UK Limited
Fisher Clinical Services UK Limited
Fisher Scientific UK Limited
Life Technologies BPD UK Limited
Life Technologies Limited
Oxoid Limited
Patheon UK Limited
Thermo Electron (Management Services) Limited
Thermo Electron Manufacturing Limited
Thermo Fisher Diagnostics Limited
VG Systems Limited